

1 MERKLE SIEGEL & FRIEDRICHSEN,
2 P.C.
3 1325 Fourth Ave., Suite 940
4 Seattle, Washington 98101-2509
5 Phone (206)-624-9392
6 Fax (206) 624-0717

THE HONORABLE
JOHN C. COUGHENOUR

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 JAMES S. GORDON, JR,
12 a married individual d/b/a
13 'GORDONWORKS.COM'; OMNI
14 INNOVATIONS, LLC., a Washington
15 limited liability company;

16 Plaintiffs,

17 v.

18 VIRTUMUNDO, INC, a Delaware
19 corporation, d/b/a
20 ADKNOWLEDGEMAIL.COM;
21 ADKNOWLEDGE, INC., a Delaware
22 corporation, d/b/a
23 ADKNOWLEDGEMAIL.COM; SCOTT
24 LYNN, and his marital community; and
25 JOHN DOES, I-X,

26 Defendants,

NO. CV-06-0204JCC

**[FIRST AMENDED]
COMPLAINT FOR DAMAGES UNDER THE
CAN-SPAM ACT OF 2003 [15 U.S.C. §7701, et
seq.]; WASHINGTON CONSUMER
PROTECTION ACT (RCW 19.86); THE
WASHINGTON COMMERCIAL
ELECTRONIC MAIL ACT (RCW 19.190);
RCW 19.170 et seq., and Injunctive Relief**

[JURY DEMANDED]

27 COME NOW, Plaintiffs James S. Gordon, Jr., and Omni Innovations, LLC., and bring this
28 COMPLAINT against defendants named herein. Plaintiffs allege the following on information
and belief:

NO. CV-06-0204JCC
FIRST AMENDED COMPLAINT

Page 1 of 14

MERKLE SIEGEL & FRIEDRICHSEN, P.C.
1325 Fourth Ave., Suite 940
Seattle, WA 98101-2509
Phone: 206-624-9392
Fax: 206-624-0717